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March 14, 2025

**VIA ECF**

Hon. Andrew E. Krause, U.S.M.J.  
The Hon. Charles L. Brieant Jr.  
Federal Building and United States Courthouse  
300 Quarropas Street  
White Plains, NY 10601-4150

**Re: *Project Veritas et al. v. O’Keefe et al.*, No. 23-CV-04533-CS-AEK  
(S.D.N.Y.)**

Dear Judge Krause:

I write as counsel for Plaintiffs and Counter-Claim Defendants Project Veritas and Project Veritas Action Fund (collectively, “Plaintiffs”), further to the status conference held before Your Honor on March 10, 2025.

As discussed at the status conference, three primary discovery issues presently remain outstanding. *First*, Defendants challenge Plaintiffs’ designation of the transcript of the deposition of Joseph Barton as confidential. Plaintiffs maintain that the transcript was properly designated confidential in its entirety. Nonetheless, Plaintiffs continue to review the transcript and propose providing to Defendants proposed redactions no later than Tuesday, March 18, 2025.

*Second*, Defendants challenge Plaintiffs’ designation of fourteen documents as privileged. Plaintiffs maintain that such documents were appropriately identified as privileged and withheld. Plaintiffs request an opportunity to respond, in further detail, to Defendants’ December 23, 2024 letter motion (Dkt. 118), and propose a response deadline of Tuesday, March 18, 2025.

*Third*, as stated on the record at the status conference, Plaintiffs do not oppose Defendants’ request for alternative service on Matthew Tyrmand.

Finally, the parties have reached an agreement in principle on the voluntary dismissal of Plaintiffs’ claims. Plaintiffs await receipt of a signed stipulation from Defendants and expect to file the same as soon as received.

We thank the Court for its patience as counsel continues to familiarize itself with the record and the outstanding issues and we are available to address any questions Your Honor may have at the Court’s convenience.

Respectfully Submitted,

A handwritten signature in black ink, appearing to read "Michael J. Harris". The signature is written in a cursive, flowing style with a large initial "M" and "H".

Michael J. Harris